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To: "Dave Carlson" <dcarlson@waterboards.ca.gov>
Date: 9/27/2007 8:18:24 AM
Subject: Colfax Wastewater NPDES hearing continued to October 25-26, 2007

To: David Carlson, Chief, NPDES Section
Central Valley Regional Water Quality Control Board

Regarding Colfax NPDES Permit No. CA0079529, Friends of the North Fork, a California nonprofit corporation, finds that the Central Valley Regional Water Quality Control Board's tentative order does not address discharge flow and other limitations in a manner that carries out the Regional Board's duty to protect the beneficial uses of the North Fork American River.

The Colfax facility in question discharges through an unnamed tributary into Smuthers Ravine, and then into Bunch Canyon, and then into the North Fork American River near Yankee Jim's Road. We have reason to believe that uncontrolled discharge or leakage from Colfax sewer operations and discharge from other sources enters Bunch Canyon above where Smuthers Ravine enters Bunch Canyon. We are also concerned that Live Oak Canyon that discharges into Bunch Canyon between Smuthers Ravine and the North Fork American River may be a source of pollutants. The tentative order has no means identify whether this is the case, or to monitor affected watercourses below the discharge point, nor does it have monitoring locations regarding other discharges into Smuthers Ravine and Bunch Canyon. The Regional Board is therefore unable to determine if there are other violators and it is unable to allocate responsibility against Colfax and other possible dischargers whose discharge enters the American River near Yankee Jims Road. Among the beneficial uses immediately affected, including those of a Friends board member, are the significant number of individual property owners and who use the North Fork American River as a source of drinking water for a distance of about 2 1/2 miles downriver from the discharge point into the North Fork near Yankee Jim's Road. Indeed, the North Fork between Yankee Jims Road and Ponderosa Way is probably the most heavily privately populated stretch of the immediate river frontage between Folsom Dam and its headwaters. The time of notable potential Colfax facility discharge in the spring coincides with the North Fork's most active recreational rafting period. The remote municipal drinking water intake for the Placer County Water Agency that is over 16 miles downriver from the discharge point in question near Yankee Jim Road is below the Clementine Reservoir debris dam and is also below the much higher volume Middle Fork American River entry into the North Fork at the confluence. The public interest in the North Fork including private drinking water users and other users requires assurances through monitoring that the water quality is maintained and a mechanism to warn Yankee Jim Road to Ponderosa Way drinking water users when water quality standards are being violated. A mechanism to assure that, if needed, do not use orders go the necessary parties should also be in place.

This outline of items for your review and our discussion with you is from the discharge-related monitoring list we submitted for the previous hearing:

- a.. Water quality of Colfax collection system infiltration and inflow, collection system leakage/discharge, system area groundwater, and at the system's point of entry to treatment operation.
- b.. Flows in each watercourse that may contain water from the collection system and of watercourse water quality.
- c.. Flows in the unnamed tributary to Smuthers Ravine above each reservoir if there is such a watercourse, the unnamed tributary to Smuthers Ravine below the dam, Bunch Canyon, Live Oak Ravine Canyon, and the North Fork American River at Bunch Canyon.
- d.. Water quality in each of the three ponds, in Smuthers Ravine, in Bunch Canyon above and below Smuthers Ravine, in Live Oak Ravine right above where it enters Bunch Canyon, the North Fork American River above and below where Bunch Canyon enters it.
- e.. E-coli included as a parameter in all monitoring.
- f.. Monitoring for these parameters at the above monitoring locations: e-coli, fecal coliform, total coliform, nitrogen, phosphorous, dissolved oxygen, pH, temperature, total suspended solids, turbidity.
- g.. Design, implementation and reporting on this monitoring by a neutral party.

After a field trip to the facility with the city, we emphasize a number of concerns about discharge and monitoring parameters. For example:

outside scope of hearing

outside scope
of hearing

a.. Algae growth at the large facility reservoir dam and in the watercourses below the facility discharge point are one indication of the necessity to monitor for phosphorous so the nitrogen-phosphorous ratio as a factor affecting algae growth may be obtained.

b.. The fecal coliform factor is inadequate to supply the information that e-coli sampling yields. E-coli sampling is also important for determining load allocation.

We found on the June 27, 2007 facility tour with the city common goals and efforts and the beginning of a cooperative working relationship with the city.

I declare under penalty of perjury and the laws of the state of California that the foregoing is true and correct.

Michael Garabedian

Dated: September 26, 2007

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